### RECEIVED

MAR 2 4 1993

February 19, 1993

Acting Chairman James Quello Federal Communications Commission Washington, DC 20554

Dear Chairman Quello,



FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

As manager of an independent television station that has broadcast "Home Shopping Club" for the past five and one half years I am distressed that our station may be denied must-carry status under the recently enacted cable reregulation law. Denial of cable access due to program content is clearly unfair, and perhaps unconstitutional, to stations such as WBSX-TV.

Our city of license, Ann Arbor, is within the grade 'B' contour of eighteen different broadcast television signals serving up a huge diversity of programming catering to the needs of every segment of our population. Those who choose to view home shopping are as intensely loyal to this genre of programming as any other audience segment you will find. With the large number of broadcast choices available to the public it is perplexing that our type of station is singled out for potentially different treatment. As home shopping stations are generally located in heavily populated markets there is no doubt that viewers in these areas are well served by a number of local stations offering a wide variety of programming.

Public interest programming has always been important to WBSX-TV. We produce two weekly half hour public affairs programs that address various and significant local issues as well as a number of locally oriented segments that air throughout the day during shopping. Our schedule of local and national public service announcements has always been heavy. Further, WBSX-TV airs three half hour educational programs that are truly created with the needs of children and their education in mind. We respect the intent of the current legislation on children's television and make no effort to pass off cartoons as "educational" programming. The material we are providing on our station's programming clearly demonstrates our committment to serving the public interest as a licensee.

Our affiliation with Home Shopping Club allowed Blackstar Communications to acquire this station. As a non-ADI station this relationship has allowed us the opportunity to provide locally originated programming while remaining economically viable during changing competitive times for broadcsaters.

No. of Copies rec'd\_



Chairman James Quello page two February 19, 1993

We only ask to be treated equally with other broadcasters before the FCC. I am certain you will agree after reviewing our programming and other material that this request is well warranted.

Very truly yours,

Christopher J. Webb

Vice President & General Manager

Blackstar Communications of Michigan, Inc.

## PROGRAM SERVICE COMPARISON BLACKSTAR COMMUNICATIONS OF MICHIGAN, INC. INDEPENDENT COMMERCIAL TELEVISION STATIONS

SEPTEMBER 20-26, 1992

STATION	WBSX	WXON	WSYM	WKBD	WADL	WGPR
	ANN ARBOR	DETROIT	LANSING	DETROIT	MT. CLEMENS	DETROIT
NEWS/PUBLIC	375	192	50	380	398	144
AFFAIRS	5.0%	2.5%	.7%	5.0%	5.3%	1.9%
CHILDREN'S	129	24	24	0	0	48
	1.7%	.3%	. 3%	0%	0%	.6%
MINORITY	50	0	0	50	0	148
	.7%	0%	0%	.7%	0%	2.0%
LOCAL	286	72	0	382	0	124
	3.8%	1.0%	0%	5.1%	0%	1.6%
TOTAL NON-	554	216	74	430	398	340
ENTERTAINMENT	7.3%	2.9%	1.0%	5.7%	5.3%	4.5%

<sup>\*</sup>Totals in minutes, week of September 20-26, 1992, 6 a.m. to midnight only

Listings from Detroit News/Free Press TV Book September 20-26, 1992, TV Guide September 19-25, 1992, Jackson Citizen Patriot September 20-26, 1992.

# TV 31 WBSX

MAR 2 4 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

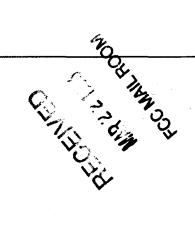
February 19, 1993

Acting Chairman James Quello Federal Communications Commission Washington, DC 20554

Dear Chairman Quello,

As manager of an independent television station that has broadcast "Home Shopping Club" for the past five and one half years I am distressed that our station may be denied must-carry status under the recently enacted cable reregulation law. Denial of cable access due to program content is clearly unfair, and perhaps unconstitutional, to stations such as WBSX-TV.

Our city of license, Ann Arbor, is within the grade 'B' contour of eighteen different broadcast television signals serving up a huge diversity of programming catering to the needs of every segment of our population. Those who choose to view home shopping are as intensely loyal to this genre of programming as any other audience segment you will find. With the large number of broadcast choices available to the public it is perplexing that our type of station is singled out for potentially different treatment. As



Chairman James Quello page two February 19, 1993

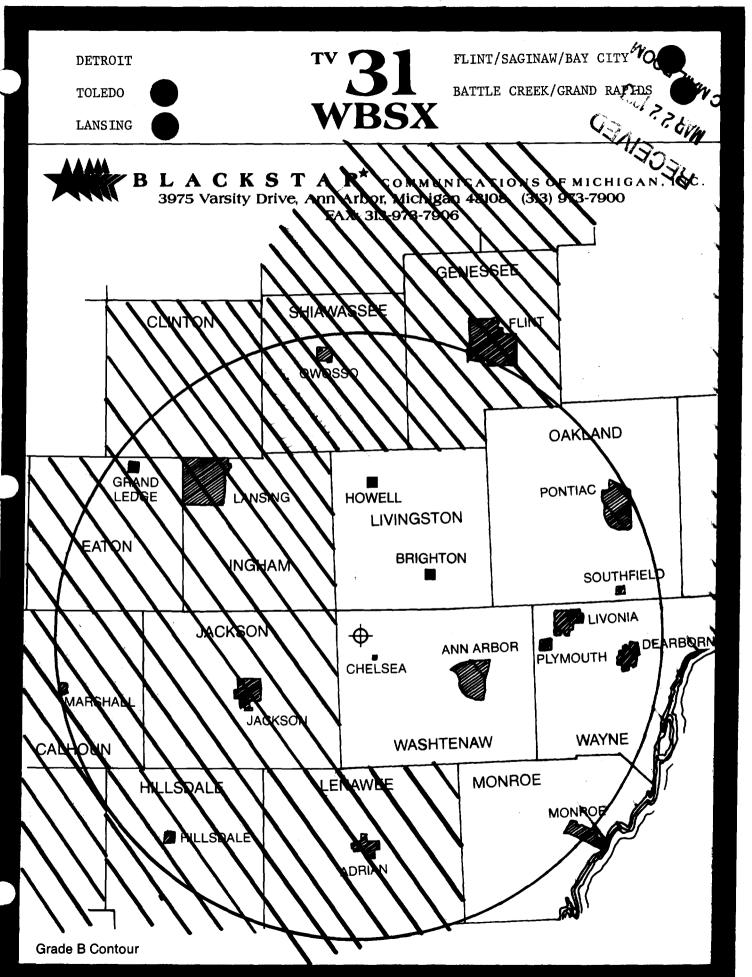
We only ask to be treated equally with other broadcasters before the FCC. I am certain you will agree after reviewing our programming and other material that this request is well warranted.

Very truly yours,

Christopher J. Webb

Vice President & General Manager

Blackstar Communications of Michigan, Inc.



### BROADCAST STATIONS WITH GRADE 'B' CONTOUR REACHING ANN ARBOR, MICHIGAN

Call sign City of License

WBSX Ann Arbor

WKBD Detroit

WXON Detroit

WDIV Detroit

WJBK Detroit

WGPR Detroit

WXYZ Detroit

WTVS Detroit

WADL Mount Clemens

WILX Lansing/Onondaga

CBET Windsor, Ontario, Canada

WLNS Lansing

WSYM Lansing

WTOL Toledo

WTVG Toledo

WGTE Toledo

WKAR East Lansing

WLAJ Lansing

Source- Television and Cable Factbook, 1991

#### WBSX-TV OVERVIEW

WBSX-TV, licensed to Ann Arbor, Michigan is a multi-market non-ADI station that reaches the majority of the Detroit television market, as well as most all of the Lansing television market. The unusual location of the WBSX-TV antenna gives us a grade 'B' home potential of over one million, but comes from four different TV markets. Our primary service area is comprised of four counties and significant parts of several others within the grade 'A' signal. The following details the grade 'A' coverage.

COUNTY	*POPULATION	+TV HOUSEHOLDS	MEDIAN HH INCOME	% GRADE A COVERAGE	WBSX-TV TVHH
	222 225		406.007	100	101 (00
Washtenaw	282,937	101,600	\$36,307	100	101,600
Livingston	n 115,645	39,300	\$45,439	100	39,300
Jackson	149,756	51,800	\$29,156	100	51,800
Ingham	281,912	101,300	\$30,162	100	101,300
Wayne	2,111,687	797,600	\$27,997	60	478,560
Oakland	1,083,592	404,700	\$43,407	45	182,115
Lenawee	91,476	32,300	\$31,012	<b>7</b> 0	22,610
Monroe	133,600	47,000	\$35,462	50	23,000
	4,250,605	1,575,600	\$34,868 ave	$3. \overline{N/A}$	1,000,785

<sup>\*</sup>Population numbers are from the 1990 U.S. Census +Arbitron Television Universe Estimates Summary 1990-1991.

The Detroit/Ann Arbor market includes 185,045 active Home Shopping Club members, according to Home Shopping Network.

#### MARKET CHARACTERISTICS

The economic base within the WBSX coverage area varies widely with manufacturing, high tech, service, education, and state government. As with all local economies in southern Michigan the automotive industry has a large presence, but technology and the service industry have added strength and long term stability to the economy. The state capital, Lansing, and two major universities, University of Michigan and Michigan State, are within the grade 'A' signal contour and employ close to 100,000 people. Further, the automotive industry provides many high paying jobs throughout southern Michigan.

The demographics of the WBSX coverage area vary widely, as do the local economies. Ann Arbor is very young, with a median age of 27.3. The large number of college students will give a relatively low median age in Ann Arbor and Lansing, with higher numbers in Jackson and Livingston Counties due to a more established population and lack of a major university.

Employment in local economies breaks down as follows:

LANSING: State of Michigan, Michigan State University, General Motors.

LIVINGSTON COUNTY: Mostly rural, considered a bedroom community to Ann Arbor and

Detroit.

JACKSON: Consumers Power, Aeroquip, Southern Michigan Prison.

WAYNE & OAKLAND

COUNTIES: Metropolitan Detroit, with all types of employment in high tech, automotive, banking and finance, education and government.

teen, automotive, panking and illiance, education and government

Tourism is a strong industry throughout the year in our area with a large number of lakes, resorts, ski areas, and camping sites. Hunting season in Michigan brings in thousands, especially during deer season.

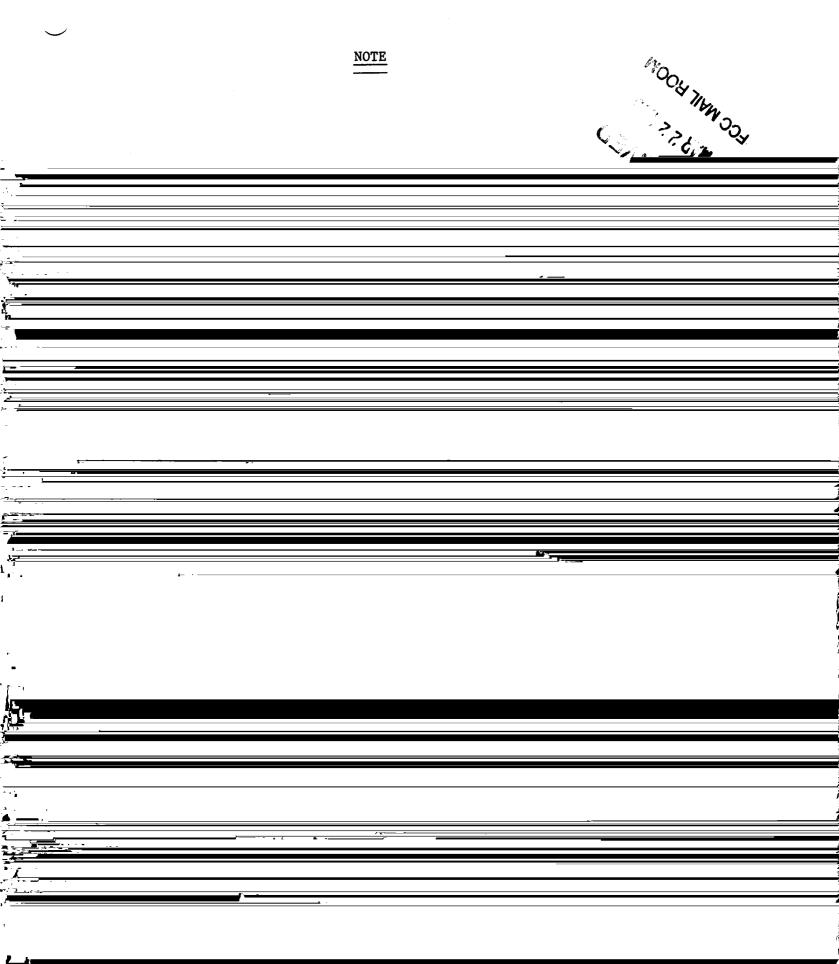
# PROGRAM SERVICE COMPARISON BLACKSTAR COMMUNICATIONS OF MICHIGAN, INC. INDEPENDENT COMMERCIAL TELEVISION STATIONS

### SEPTEMBER 20-26, 1992

STATION	WBSX	WXON	WSYM	WKBD	WADL	WGPR
	ANN ARBOR	DETROIT	LANSING	DETROIT	MT. CLEMENS	DETROIT
NEWS/PUBLIC	375	192	50	380	398	144
AFFAIRS	5.0%	2.5%	.7%	5.0%	5.3%	1.9%
CHILDREN'S	129 1.7%	24 .3%	24	0 0%	0 0%	48 .6%
MINORITY	50	0	0	50	0	148
	.7%	0%	0%	.7%	0%	2.0%
LOCAL	286	72	0	382	0	124
	3.8%	1.0%	0%	5.1%	0%	1.6%
TOTAL NON-	554	216	74	430	398	340
ENTERTAINMENT	7.3%	2.9%	1.0%	5.7%	5.3%	4.5%

<sup>\*</sup>Totals in minutes, week of September 20-26, 1992, 6 a.m. to midnight only

Listings from Detroit News/Free Press TV Book September 20-26, 1992, TV Guide September 19-25, 1992, Jackson Citizen Patriot September 20-26, 1992.



### CHILDREN'S PROGRAMMING COMMERCIAL TIME LIMIT COMPLIANCE

Period Oct. 1 to Dec. 31, 1992
Station Call Sign WBSX TV

### 1. COMMERCIAL MATTER

The undersigned hereby certifies under penalty of perjury that the above listed station, as a standard practice, formats and airs the children's programs (produced primarily for children aged 12 and under) listed below within the limits set forth by the Children's Television Act of 1990.<sup>1/2</sup>

### 2. CHILDREN'S PROGRAM'S PRODUCED AND AIRED PRIMARILY FOR CHILDREN (12 and under)

A. Broadcast Programs (including short-segment programming and PSAs):

<u>Title*</u>	<u>Time</u>	<u>Date</u>	<u>Duration</u>	Frequency
Go For It	6:00 a.m.	SUNDAYS	30 Minutes	Weekly (Ended 12/13/92)
Candid Kids Clu	b6:30 a.m.	SUNDAYS	30 Minutes	Weekly (Ended 12/13/92)
The Children's Room	7:30 a.m.	SUNDAYS	30 Minutes	Weekly
Video Classroom	ROS	SUN-SAT	2-4 Minutrs	Daily
PSA's	ROS	SUN-SAT	30-90 Seconds	Daily

Executed on \_\_\_\_\_January 10, 1993

Men Esters Affairs
(Name and title)

Public

Affairs

<sup>\*</sup> Program Descriptions Attached

To the extent that the station has relied on information provided by networks or syndicators, Exhibit A provides copies of such documentation. To the extent that there have been any inadvertent overages during the quarter covered by this report, such instances, if any, are described in Exhibit B.

### QUARTERLY CHILDREN'S PROGRAMMING REPORT

# CHILDREN'S PROGRAMMING, NONBROADCAST EFFORTS AND SUPPORT FOR OTHER STATIONS' CHILDREN'S PROGRAMMING

Period Oct. 1 to Dec. 31, 1992 Station Call Sign WBSX TV

The following Report lists the station's children's programming, nonbroadcast efforts and support for other stations' children's programming broadcast during the period referenced above. This Report includes those programs and activities specifically directed toward meeting the educational and informational needs of children 16 years of age and under as well as the station's overall nonchildren's programming nevertheless viewed by children, which in the opinion of management also meets their educational and informational needs.

### A. Educational and Informational Children's Programming (including short segment programming and PSAs)

<u>Title*</u>	<u>Time</u>	<u>Date</u>	<u>Duration</u>	Frequency
√ Go For It	6:00 a.m.	SUNDAYS	30 Minutes	Weekly(Ended 12/13/92)
Candid Kids Club	6:30 a.m.	SUNDAYS	30 Minutes	Weekly(Ended 12/13/92)
The Children's Room	m 7:30 a.m.	SUNDAYS	30 Minutes	Weekly
Video Classroom	ROS	SUN-SAT	2-4 Minutes	Daily
PSA's	ROS	SUN-SAT	30 Seconds	Daily

<sup>\*</sup> Program Descriptions Attached

### B. General Audience Programming

<u>Title*</u>	<u>Time</u>	<u>Date</u>	<u>Duration</u>	Frequency
Another Ann Arbor	7:00 a.m.	SUNDAYS	30 Minutes	Weekly
Sunday Edition	8:00 a.m.	SUNDAYS	30 Minutes	Weekly
One Church One Child	ROS	SUN-SAT	2 Minutes	Daily
Community Calendar	ROS	SUN-SAT	4 Minutes	Daily
PSA's	ROS	SUN-SAT	30-90 Seconds	Daily

### C. Nonbroadcast Efforts

Mentor Program: This program is part of the Ann Arbor Public Schools "Partners in Excellence" Program, a mentorship program which brings business people into the classroom. The Public Affairs Director worked with Junior High School students to produce Public Service Announcements.

### D. Support for Other Stations' Children's Programming

ISSUE: CHILDREN'S PROGRAMMING

PUBLIC SERVICE ANNOUNCEMENT: Higher Education, Youth for Understanding, Child Reach Sponsor, You Should Be In College, Kidspeace, etc. (Affidavits attached)

MENTOR PROGRAM: This program is part of the Ann Arbor Public Schools "Partners in Excellence" Program, a mentorship program which brings business people into the classroom. The Public Affairs Director worked with Junior High School students to produce Public Service Announcements. They were allowed to choose a topic which they were interested in, a few examples were anti-smoking, recycling, drinking and driving, anti-drugs. The students were taped at WBSX-TV 31 studios, and the student produced Public Service Announcements began airing at the start of the second quarter of 1992.

GO FOR IT: This show uses various celebrity individuals to introduce topics of interest as well as offer tips on fitness, sports, fashion, etc. to young people. This show aired on Sundays at 6:00 a.m. and last aired on 12/13/92 (See Attached)

CANDID KIDS CLUB: Through adventure and creativity this series combines education and fun in a variety of situations. The series aired on Sundays at 6:30 a.m. and last aired on 12/13/92

THE CHILDREN'S ROOM: The wonderful world of children's literature comes to life in this award-winning series. Designed for pre-school kids, the focus throughtout is on quality-dynamic stories, lively illustrations, and vivid animation. The show aired on Sundays at 7:30 a.m.

### GO FOR IT SUMMARY

10/11/92	EPISODE	41
10/25/92	ti	43
11/8/92	**	45
11/15/92	ti .	46
11/22/92	11	47
12/6/92	11	49

### CANDID KIDS CLUB SUMMARY

10/11/92	EPISODE	41
10/25/92	11	43
11/8/92	11	45
11/15/92	11	46
11/22/92	11	47
12/6/92	11	49

IN THIS EPISODE OF GO FOR IT, WE LOOK AT THE WORLD OF SHOW HORSES AND COMPETITIVE HORSE JUMPING. WE WILL FIND OUT HOW HORSES ARE TRAINED TO LEAP SUCH GREAT HEIGHTS. WE ALSO GET HEALTH TIPS TO FIND OUT HOW TO KEEP OUR MUSCLES STRONG TO BE MORE COMPETITIVE IN SPORTS. THEN WE PARTICIPATE IN ONE OF THE MOST POPULAR ACTIVITIES FOR FUN AND FITNESS, ROLLAR BLADING. WE WILL SEE HOW TO SKATE WITH THE BEST, BUT SKATE SAFE. THEN WE PROFILE ONE OF THE GREATEST CATCHERS EVER TO PLAY THE GAME OF BASEBALL, JOHNNY BENCH. FINALLY WE TALK WITH MONICA SELES, THE NUMBER 1 RANKED WOMENS PLAYER IN THE GAME TO FIND OUT HOW SUCH A YOUNG ATHLETE DEALS WITH THE PRESSURE OF BEING THE BEST.

EPISODE <sup>46</sup> OF GOFOR IT! FEATURES A PROFILEOF AMERICAN GLADIATOR NITRO, INTERVIEWWITH MINNESOTA TIMBERWOLVES STARFORWARD CHRISTIAN LAITTNER, EVE ELLISHAS A TENNIS TIP ON SWITCHINGHANDS, MIKE MOTTA TALKS ABOUT MUSCLE BUILDING FOR BASKETBALLAND A PROFILE OF FORMER BALTIMORE ORIOLES PITCHER, JIM PALMER.

EPISODE #41 OF GOFOR IT! FEATURES A PROFILEOF AMERICAN GLADIATOR NITRO, INTERVIEWWITH MINNESOTA TIMBERWOLVES STARFORWARD CHRISTIAN LAITTNER, EVE ELLISHAS A TENNIS TIP ON SWITCHINGHANDS, MIKE MOTTA TALKS ABOUT MUSCLE BUILDING FOR BASKETBALLAND A PROFILE OF FORMER BAITIMORE OF TOTAL TIME TO THE PROFILE OF TOTAL BAITIMORE OF THE PROFILE OF THE PROFI

EPISODE #47 OF GOFOR IT! FEATURES A PROFILEOF AMERICAN GLADIATOR NITRO, INTERVIEWWITH MINNESOTA TIMBERWOLVES STARFORWARD CHRISTIAN LAITTNER, EVE ELLISHAS A TENNIS TIP ON SWITCHINGHANDS, MIKE MOTTA

EPISODE #41 OF CANDID KIDS' CLUB FEATURES AN INTERVIEW WITH AMERICAN GLADIATOR "ICE", A PROFILE AND INTERVIEW WITH STAR OF NEW MOVIE "SCHOOL TIES", BRENDAN FRASER, RANGER TOM TALKS ABOUT WATER POLLUTION, THE KID ON THESTREET DISCUSSES MAGIC JOHNSON AND A.I.D.S. AND CRAIG TAKES A LOOK AT TWO BOOKS ON RECYCLING.

EPISODE #43 OF CANDID KIDS'CLUB INCLUDES INTERVIEWS WITH CLIPS FROM STARS OF THE NEW MOVIE, THE MIGHTY DUCKS, A PROFILE OF ADAM KEEPE, NEW PLAYER FOR THE ATLANTA HAWKS, ANOTHER QUESTION FOR THE KID ON THE STREET, A REVIEW OF TWO BOOKS DESIGNED FOR THE EXPLORER, AND A LOOK AT PICKING THE RIGHT SHOE FOR THE RIGHT SPORT.

41

EPISODE #42 OF CANDID KIDS' CLUB FEATURES AN INTERVIEW WITH AMERICAN GLADIATOR "ICE", A PROFILE AND INTERVIEW WITH STAR OF NEW MOVIE "SCHOOL TIES", BRENDAN FRASER, RANGER TOM TALKS ABOUT WATER POLLUTION, THE KID ON THESTREET DISCUSSES MAGIC JOHNSON AND A.I.D.S. AND CRAIG TAKES A LOOK AT TWO BOOKS ON RECYCLING.

EPISODE 49 OF CANDID KIDS'CLUB INCLUDES INTERVIEWS WITH CLIPS FROM STARS OF THE NEW MOVIE, THE MIGHTY DUCKS, A PROFILE OF ADAM KEEPE, NEW PLAYER FOR THE ATLANTA HAWKS, ANOTHER QUESTION FOR THE KID ON THE STREET, A REVIEW OF TWO BOOKS DESIGNED FOR THE EXPLORER, AND A LOOK AT PICKING THE RIGHT SHOE FOR THE RIGHT SPORT.

Raven En leap

TO: WBSX-TV 31 PUBLIC FILE

FROM: Karen E. Keys

Public Affairs Director

WBSX-TV 31

RE: Fourth Quarter, 1992

The following are issues of significant importance to our community of license and were given significant treatment in the programming of WBSX-TV 31 during the fourth quarter of 1992. Individual reports on each issue are included with this report.

\*LOCAL INTEREST PROGRAMMING

\*HEALTH AND SAFETY

\*ENVIRONMENT

\*ARMED FORCES

\*MINORITY AFFAIRS

\*A HUMANE SOCIETY

\*SOCIAL DILEMAS

\*RELIGION